

Amanda Katzenstein, Esq. (VBN #82273)  
POLSINELLI LLP  
Three Embarcadero Center, Suite 1350  
San Francisco, California 94111  
(415) 248-2100

Robert J.E. Edwards (admitted *pro hac vice*)  
POLSINELLI PC  
900 West 48<sup>th</sup> Place, Suite 900  
Kansas City, Missouri 64112  
(816) 753-1000

*Counsel for certain Lender Trusts and their  
Special Servicer, KeyBank National Association*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>CIRCUIT CITY STORES, INC., et al.,</b>	)	<b>Case No. 08-35653-KRH</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered</b>

**NOTICE OF INTENT TO ATTEND HEARING  
Docket No. 14031**

The below listed Lender Trusts (*see Exhibit A*) will appear by and through their counsel, Robert J.E. Edwards, and will attend the hearing noticed herein as Docket No. 14031. The Lender Trusts do not oppose the noticed relief sought by the Liquidating Trust in the hearings but will participate to the extent necessary to demonstrate that they are the proper holder of the claim at issue.

U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1997-C1 (“**Lender Trust No. 2**”) was the secured lender for the landlord of the property at issue in Claim Nos. 9707 and 9407 (the “**Lafayette, Louisiana Property**”). Lender Trust No. 2 has since foreclosed on the Lafayette, Louisiana Property. Pursuant to the loan documents between

Lender Trust No. 2 and landlord, Lender Trust No. 2 is the proper holder of the claim concerning the Lafayette, Louisiana Property. Lender Trust No. 2 files herewith and incorporates herein the Affidavit of Robert Records in Response to Notice of Substantive Hearing – Docket No. 14031 in support of its position.

Dated: March 31, 2017

Respectfully submitted,

POLSINELLI LLP

AMANDA KATZENSTEIN (VBN #82273)  
Three Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
(415) 248-2100  
Fax No. (415) 248-2101  
[akatzenstein@polsinelli.com](mailto:akatzenstein@polsinelli.com)

POLSINELLI PC

By: /s/ Robert J.E. Edwards  
ROBERT J.E. EDWARDS (admitted *pro hac vice*)  
900 West 48<sup>th</sup> Place, Suite 900  
Kansas City, Missouri 64112  
(816) 753-1000  
Fax No. (816) 753-1536  
[redwards@polsinelli.com](mailto:redwards@polsinelli.com)

*Counsel for certain Lender Trusts and their  
Special Servicer, KeyBank National Association*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March 2017, a true and correct copy of the above and foregoing was filed using the Court's CM/ECF system that sent notice of such filing to counsel for the Debtors, Liquidating Trust, U.S. Trustee, and all interested parties by ECF notification from the Court.

/s/ Robert Edwards

**Exhibit A**

**LENDER TRUSTS**

1. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1997-C1.
2. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1998-C2.
3. Wells Fargo Bank, N.A., successor by merger to Wells Fargo Bank Minnesota, N.A. f/k/a Norwest Bank Minnesota, N.A. as trustee for the registered holders of Merrill Lynch Mortgage Investors, Inc., Mortgage Pass-Through Certificates, Series 1998-C1-CLT.